

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA	]	
	]	
v.	]	No. 20-CR-00006-PB
	]	
CHRISTOPHER CANTWELL	]	

**DEFENDANT'S PROPOSED JURY VOIR DIRE QUESTIONS**

The Defendant requests that the Court include the following questions in its inquiry of potential jurors at jury selection:

*Questions about the Defendant*

- The Defendant, Christopher Cantwell, hosts an online radio program. Are you familiar with Christopher Cantwell from his radio program or from any other news source?
- Having heard the charges, are you familiar with the facts of this case?

*Questions about Coronavirus*

- Do you have any medical diagnoses which you believe puts you in a high-risk category for contracting or experiencing death from COVID-19?
- Do you live with anyone that is in a high-risk category of contracting or experiencing death from COVID-19?
- Would you feel pressure to reach a verdict quickly to avoid exposure to COVID-19?
- Would you be distracted during the evidence by a fear of contracting COVID-19?
- Would you change your verdict to agree with others, or compromise with other jurors, in order to end deliberations faster so you could leave the courthouse sooner?
- Do you have children? If so, do you have arrangements for childcare for the entirety of the expected length of trial?

*Case-specific Questions*

- You may hear evidence that the Defendant, alleged victim, and/or witnesses participated in different factions of the alternative right, "alt-right," or white nationalist political movement.
  - If you are familiar with this movement, do you have any bias against those who have participated in this movement?

- Do you have strongly held beliefs or opinions about the alt-right/white nationalist movement that will make it difficult for you to listen to the testimony and evidence in this case and be fair to the parties?
- Are you a member or supporter of any group that campaigns for racial, ethnic, gender or religious equality (*i.e.* Black Lives Matter, NAACP, Anti-Defamation League, an immigrants' rights group, or a feminist group)?
  - Have you posted or shared others' posts online (*i.e.* on Facebook, Twitter, Instagram) supporting such groups or causes??
  - Have you attended a rally or political demonstration supportive of such groups or causes?
  - If so, will this support make it difficult for you to listen to and consider the testimony and evidence in this case should it be derogatory toward those causes and the persons they represent?
- Should the evidence show that the Defendant was involved in a part of the alt-right movement, do you believe that he should be denied the fundamental rights that are guaranteed to all defendants?
  - Are you unable to afford the Defendant the same presumption of innocence as any other defendant if you learned that he was involved in the alt-right movement?
  - Are you unable to consider his case, as you must, without bias, prejudice, sympathy, or fear if you learned that he was involved in the alt-right movement?

Respectfully submitted,  
Christopher Cantwell  
By His Attorney,

Date: September 8, 2020

/s/ Eric Wolpin  
Eric Wolpin  
N.H. Bar No. 18372  
/s/ Jeffrey S. Levin  
Jeffrey S. Levin  
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**CERTIFICATE OF SERVICE**

I hereby certify that the above document was served on September 8, 2020 in the manner specified herein: provided to the Government via ECF.

/s/ Eric Wolpin

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